

CLARK HILL PLLC
PAOLA M. ARMENI
Nevada Bar No. 8357
Email: parmeni@clarkhill.com
3800 Howard Hughes Pkwy., #500
GIA N. MARINA
Nevada Bar No. 15276
Email: gmarina@clarkhill.com
Las Vegas, Nevada 89169
Tel: (702) 862-8300
Fax: (702) 862-8400
Attorneys for Plaintiffs, Perez Family

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

VICTOR PEREZ, as Special Administrator of
the Estate of CARLOS PEREZ, deceased;
VICTOR PEREZ, as the Guardia Ad Litem for
S.E.P., a minor; VICTOR PEREZ, as the Guardia
Ad Litem for A.I.P., a minor,

Plaintiffs,

vs.

STATE OF NEVADA, ex.rel. NEVADA
DEPARTMENT OF CORRECTIONS;
DIRECTOR GREG COX, individually;
WARDEN DWIGHT NEVEN, individually;
ASSISTANT WARDEN TIMOTHY FILSON,
individually; COT. RAMOS, individually;
LIEUTENANT OLIVER, individually;
CORRECTIONS OFFICER CASTRO,
individually; CORRECTIONS OFFICER
SMITH, individually; and DOES I-X, inclusive;
and ROES I-X, inclusive,

Defendants.

CASE NO.: 2:15-cv-01572-APG-DJA

**STIPULATION AND ORDER TO
EXTEND DEADLINE FOR PLAINTIFFS'
TO FILE A RESPONSE TO DEFENDANT
ISIAH SMITH'S OBJECTION TO
PLAINTIFFS' EVIDENCE IN SUPPORT
OF RESPONSE TO MOTION FOR
SUMMARY JUDGEMENT [DKT 194]**

Victor Perez, as Special Administrator of the Estate of Carlos Perez, deceased, by and through his counsel, Paola M. Armeni, Esq. and Gia N. Marina, Esq., of the law firm of Clark Hill and Defendant Isaiah Smith, by and through his counsel of record Jeffrey F. Barr, Esq. of the law firm of Armstrong Teasdale, hereby respectfully submit this Stipulation and Order Extending Time for Plaintiff to Respond to Defendant Isaiah Smith's Objections to Plaintiffs' Evidence in Support of Response to Motion for Summary Judgement [Dkt 194] filed on February 18, 2022, which the response is currently due on March 4, 2022, to be extended an additional fourteen (14) days up to and including March 18, 2022.

1 Although Plaintiffs' counsel has been actively working on responding to Defendant's
2 Objection, counsel requires a brief extension to complete the Response. This request for extension
3 is made in good faith and not for the purposes of delay.

4 WHEREFORE, the parties stipulate that the time for Plaintiffs to file their Response to
5 Defendant Isaiah Smith's Objections to Plaintiffs' Evidence in Support of Response to Motion for
6 Summary Judgement [Dkt 194], be extended an additional fourteen (14) days up to and including
7 March 18, 2022.

8 APPROVED AS TO FORM AND CONTENT.

9 Respectfully submitted this 3rd day of March 2022.

10 **CLARK HILL, PLLC**

ARMSTRONG TEASDALE

11 */s/ Paola M. Armeni, Esq.*

/s/ Jeffrey F. Barr, Esq.

12
13 PAOLA M. ARMENI
14 Nevada Bar No. 8357
15 3800 Howard Hughes Pkwy., #500
Las Vegas, Nevada 89169
Attorneys for Plaintiffs, Perez Family

Jeffrey F. Barr, Esq.
Nevada Bar No. 007269
3770 Howard Hughes Parkway, Suite 200
Las Vegas, NV 89169
Attorneys for Defendant Isaiah Smith

16
17
18
19 **ORDER**

20 **IT IS SO ORDERED:**

21 DATED: March 4, 2022

22
23 
24 UNITED STATES DISTRICT COURT JUDGE
25
26
27
28